

U.S. EPA SUPERFUND PROGRAM  
 SEMS  
 Five Year Review Issues and Recommendations Report

<u>Site Name</u>	<u>EPA ID</u>	<u>OU</u>	<u>FYR Action</u>	<u>Action ID</u>	<u>Lead</u>	<u>Finish (Actuals)</u>
HUNTERS POINT NAVAL SHIPYARD	CA1170090087	00	FF Five-Year Review	VY6	FF	09/27/19
<u>Site Primary RPM Name:</u> Praskins, Wayne						

FYR Issues and Recommendations

<u>Issue Category</u>	<u>Issue</u>	<u>Affects Prctvns</u>		<u>Recommendation</u>	<u>Parties</u>		<u>Original</u>	<u>Current</u>	<u>Actual</u>	<u>Status</u>	<u>Verified by</u>
		<u>Curr</u>	<u>Fut</u>		<u>Completion</u>	<u>Completion</u>	<u>Completion</u>	<u>RPM Date</u>			
Other	Other Issue (uncategorized)	N	N	Other Recommendation (uncategorized)	F	B	12/31/19	12/31/23		Under Discussion	08/31/20
<u>Issue OU:</u> 02, 03	SVE implementation in Parcels B-1 and C is reducing source mass, but with limited effectiveness due to diffusion-limited conditions in the subsurface. Although ICs will maintain future protectiveness, source removal inefficiency is extending the period within which SVE will be implemented.			It is recommended that use of the SVE technology be evaluated for each treatment area due to inefficiency caused by diffusionlimited conditions. Site-specific studies (e.g., remedy analyses) should be performed to estimate the magnitude and extent of source mass at each treatment area in Parcels B-1 and C to determine if other measures could be implemented to enhance SVE performance in the future. Any changes implemented to the approach for reducing source contamination in SVE areas should be discussed in the next five-year review report. Changes made to the treatment approach should be considered for any other SVE treatment areas at HPNS, including areas where treatment is planned but has not yet been initiated.			The Navy is re-evaluating SVE in Parcel C based on the draft final RAWP we just finished reviewing.				

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Remedy Performance	Remedy Performance - Other Issue	N	Y	Remedy Performance - Other Recommendation	F	B	12/31/19	12/31/23	Under Discussion	08/31/20
<u>Issue OU:</u> 02, 04, 09	The regulatory agencies do not agree with the Navy's risk assessment methodology used to reduce the ARICs for VOC vapors.			The Navy intends to consider agency concerns (including specific recommendations made by EPA) and reevaluate its approach to calculating SGALs, which may affect the ARICs for VOC vapors at Parcels B-1, B-2, D-1, and G. Appendix E evaluates how EPA's recommendations may affect the SGALs and the ARICs for VOC vapors. Based on the information in Appendix E, none of the potential changes to the ARICs for VOC vapors affect the current protectiveness of the remedies at Parcels B-1, B-2, D-1, and G. The regulatory agencies are currently reviewing and reevaluating their methods for assessing vapor intrusion risk. Once consensus is achieved, the Navy should reevaluate its approach for calculating SGALs and adjusting ARICs for VOC vapors. The new SGALs would be developed based on the most current standards, toxicity criteria, and risk assessment methods. The new SGALs would be used to redefine the ARICs for soil gas at each parcel prior to property transfer. Any changes to soil gas risk assessment methodology should be discussed in the next five-year review report.					The Navy did an Appendix E and concluded no change even after doing the calculations EPA's way.	

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Remedy Performance	Remedy Performance - Other Issue	N	Y	Remedy Performance - Other Recommendation	F	B	11/01/23	11/01/23	Under Discussion	08/28/20
<u>Issue OU:</u> 02, 03, 04, 09, 10		The FYR included a recommendation that the Navy conduct a long-term protectiveness evaluation of the radiological remediation goals (RGs) included in site decision documents.								
		In 2019, the Navy issued two draft addenda evaluating the long-term protectiveness of the RGs. The Navy finalized the first addendum, evaluating the protectiveness of the soil RGs, in June 2020. The Navy issued the second addendum, evaluating the protectiveness of the building RGs, in October 2019. In August 2020, EPA provided written comments to the Navy on the draft building addendum and is awaiting the Navy's response. The Region has consulted with EPA Headquarters (FFRO and OSRTI) as part of the evaluation because of national issues raised by the evaluation. The primary issue is the use of Argonne National Laboratory's RESRAD BUILD calculator to evaluate radiation risk to human health rather than EPA's Building Preliminary Remediation Goal (PRG) calculator.								

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